

IN THE UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

IN RE:)	Chapter 11
DOUBLE HELIX CORPORATION,)	Case No.: 25-40745
d/b/a KDHX COMMUNITY MEDIA,)	
Debtor.)	

DECLARATION OF COURTNEY DOWDALL

I, Courtney Dowdall, declare and state as follows:

1. The statements in this Declaration are true and correct to the best of my knowledge and belief, and I have personal knowledge of the statements in this Declaration. I am over the age of 18, competent to make this Declaration, and would testify competently to the same.
2. I am one of the Plaintiffs in *Stacy Bernard, et al. v. Double Helix Corp. d/b/a KDHX Community Media, et al.*, Case No. 2522-CC00192 pending in the Circuit Court of St. Louis City before Judge Moriarty.
3. I am an Associate Member of Double Helix Corporation ("KDHX").
4. I am a Director on the KDHX Board of Directors.
5. I became a Director in August 2024. I was appointed to the Second Director Position, which I understand is one of the seats on the Board elected by the Associate Members.
6. I ran for re-election to the Board in February 2025. Voting for that election ended on February 25, 2025.
7. On March 26, 2025, Gary Pierson emailed me about the election. I understand that Mr. Pierson is still the Board President. He said that I won the election, but the Board would not seat me unless I agree to five "steps" during which the Board may require "additional steps prior to you being seated as a director." One step was to "[w]ithdraw as a litigant" in this bankruptcy

proceeding and in any other litigation against KDHX or its Directors. Exhibit A (G. Pierson Email, March 26, 2005).

8. March 26 was the first time that KDHX or any Director communicated with me since the February 25 election.


9. I have not been given notice of any Board meeting in 2025. I was not invited to attend any Board meeting or allowed to vote on any Board matter in 2025.

10. I first learned of KDHX's decision to file for bankruptcy in the news.

11. Regarding my status as an Associate Member, I was given notice of the February 2025 Annual Meeting of the Associate Members. I was not given notice of any Associate Member meeting after February 18, 2025.

12. I was not given notice of any meeting or vote held by the Board or the Associate Members on or about March 3, 2025.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Execute on March 31, 2025.



Courtney Dowdall



----- Forwarded Message -----

From: Gary Plerson <gary@garyaplerson.com>
To: courtney dowdall <groovyrooby@yahoo.com>
Sent: Wednesday, March 26, 2025 at 02:36:51 PM CDT
Subject: Board election and next steps

Courtney,

I write to address the recent Double Helix board member election and related next steps.

As you know you were suspended as a member of the Board of Directors in October 2024. As the executive committee discussed with you in December, this was due to your violation of the board service agreement and related policies, your refusal to provide requested information to the board and your communication with a federal agency in direct conflict with your fiduciary duties as a Director.

In addition, there is an unresolved personnel complaint against you submitted by an employee to the personnel committee of the board. This complaint involves your conduct as a board member and your interactions with and treatment of employees.

The term to which you were appointed as a result of the settlement agreement you entered into with Double Helix Corporation last year has ended. That agreement obligated the board to allow you to stand for election for a new term in the Associate election conducted in February. No person received a majority of votes cast in that election, but you received two more votes than any other candidate. It is up to the board to determine the process and procedures for elections, and ordinarily we would likely conduct a runoff election if no candidate received a majority of votes. However, in the current circumstances we have decided not to proceed with a runoff election.

Before the board can seat you in this position you must complete the following steps:

- Provide the information requested by me in my correspondence to you on October 1 and 15, 2024.
- Execute a new board service agreement and accompanying policies.
- Withdraw as a litigant in the case currently pending in U.S. Bankruptcy Court and any other litigation pending against Double Helix Corporation or any of its directors.
- Withdraw as a member and terminate any other involvement with the entity known as "The League of Volunteer Enthusiasts of KDHX" and any other entity involved in litigation, protests or boycotts against Double Helix Corporation.
- Participate in mediation facilitated by the Conflict Resolution Center of St. Louis or another entity of our choice to address the personnel complaint against you. You will need to pay all expenses related to this mediation and the outcome must provide a resolution satisfactory to the board and the staff.

As we move through this process, the board may learn information that requires additional steps prior to you being seated as a director, but the above steps will be required based on what we know now.

Please confirm whether you wish to move forward under these conditions.

Best,

Gary

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